Supreme Court, U.S.
FILED
DEC 13 2001
OFFICE OF THE CLERK

Nos. 00-1751, 00-1777 and 00-1779

IN THE

Supreme Court of the United States

SUSAN TAVE ZELMAN, SUPERINTENDENT OF OHIO, *et al.*,
Petitioners,

v.

DORIS SIMMONS-HARRIS, *et al.*,
Respondents.

HANNA PERKINS SCHOOL, *et al.*,
Petitioners,

v.

DORIS SIMMONS-HARRIS, *et al.*,
Respondents.

SENEL TAYLOR, *et al.*,
Petitioners,

v.

DORIS SIMMONS-HARRIS, *et al.*,
Respondents.

On Writ of Certiorari to the Unites States Court of Appeals for the Sixth Circuit

BRIEF FOR COUNCIL ON RELIGIOUS FREEDOM, NORTHWEST RELIGIOUS LIBERTY ASSOCIATION, THE SEVENTH-DAY ADVENTIST CHURCH STATE COUNCIL, AND THE INTERFAITH RELIGIOUS LIBERTY FOUNDATION AS *AMICI CURIAE* IN SUPPORT OF RESPONDENTS

ALAN J. REINACH
PACIFIC UNION CONFERENCE
OF SEVENTH-DAY ADVENTISTS
2686 Townsgate Road
Westlake Village, CA 91359
(805) 497-9457

LEE BOOTHBY
Counsel of Record
4545 42nd Street, NW
Washington, DC 20016
(202) 363-1773

BEST AVAILABLE COPY

TABLE OF CONTENTS

Page

TABLE OF AUTHORITIES ii

INTERESTS OF *AMICI CURIAE* 1

INTRODUCTION AND SUMMARY OF ARGUMENTS 2

ARGUMENTS 4

I. *MITCHELL v. HELMS* DOES NOT SUPPORT THIS VOUCHER PROGRAM 4

II. THE VOUCHER PROGRAM DIRECTLY AIDS RELIGIOUS ACTIVITIES AND INDOCTRINATION 11

A. Tuition Vouchers Fund The Religious Mission Of Religious Schools 12

B. The Philosophy Of Integrating Faith And Learning Crosses Denominational Boundaries And Is Profoundly Theological 19

C. The Textbooks And Curriculum In Religious Schools Further Evidence The Pervasive Religious Atmosphere Of Such Schools 21

III. THE VOUCHER PROGRAM IMPLEMENTED IN OHIO VIOLATES PRINCIPLES OF RELIGIOUS AUTOMONY AND COMPROMISES THE CHURCHES' RELIGIOUS EDUCATION MISSION 23

Page

CONCLUSION 30

TABLE OF AUTHORITIES

Cases:

Abington Township School Dist. v. Schempp, 374 U.S. 203 (1963) 11

Agostini v. Felton, 521 U.S. 203 (1997) 5

Board of Educ. v. Allen, 392 U.S. 236 (1968) 9

Bollard v. California Province of Soc'y of Jesus, 196 F.3d 940 (1999) 26-27,28

Bowen v. Kendrick, 487 U.S. 589 (1988) 8

Catholic Bishop of Chicago v. NLRB, 559 F.2d 1112 (7th Cir. 1977) 24

Committee for Public Educ. and Religious Liberty v. Nyquist, 413 U.S. 756 (1973) 10

Committee for Public Educ. and Religious Liberty v. Regan, 444 U.S. 646 (1980) 10

EEOC v. Catholic Univ. of America, 83 F.3d 455 (D.C. Cir. 1996) 23,27,28

EEOC v. Roman Catholic Diocese of Raleigh, N.C., 213 F.3d 795 (4th Cir. 2000) 27

Page

EEOC v. Southwestern Baptist Theological Seminary,
485 F. Supp. 255 (N.D. Tex. 1980),
aff'd in part and rev'd in part,
651 F.2d 277 (5th Cir. 1981),
cert. denied, 456 U.S. 905 (1982) 24

Grand Rapids Sch. Dist. v. Ball, 473 U.S. 373 (1985) . 9

Kedroff v. St. Nicholas Cathedral, 344 U.S. 94 (1952) . 28

Lemon v. Kurtzman, 403 U.S. 602 (1971) 3,4

McClure v. Salvation Army,
465 F.2d 553 (5th Cir. 1970) 24

Maguire v. Marquette University,
627 F. Supp. 1499 (E.D. Wis. 1986), *modified*,
814 F.2d 1213 (7th Cir. 1987) 24

Marks v. United States, 430 U.S. 118 (1977) 5

Miller v. Catholic Diocese of Great Falls,
728 P.2d 794 (Mont. 1986) 24

Minkus v. Baltimore Annual Conference,
894 F.2d 1354 (1990) 27

Mitchell v. Helms, 530 U.S. 793,
120 S. Ct. 2530 (2000) . . . . . *passim*

NLRB v. Catholic Bishop of Chicago,
440 U.S. 490 (1979) 25

Page

NLRB v. St. Louis Christian Home,
663 F.2d 60 (1981) 25

NLRB v. Salvation Army of Mass. Dorchester Day Care,
763 F.2d 1 (1st Cir. 1985) 25

Norwood v. Harrison, 413 U.S. 455 (1973) 4

Ohio Civil Rights Comm'n v. Dayton Christian Sch, Inc.,
477 U.S. 619 (1986) 26

Rayburn v. General Conference of Seventh-day Adventists,
772 F.2d 1164 (4th Cir. 1985) 24

St. Elizabeth Community Hosp. v. NLRB,
708 F.2d 1436 (9th Cir. 1983) 24

Steele v. Indus. Dev. Bd.,
117 F. Supp. 2d 693 (M.D. Tenn. 2000) 5

Tressler Lutheran Home for Children v. NLRB,
677 F.2d 302 (3d Cir. 1982) 25

Volunteers of America, Los Angeles v. NLRB,
777 F.2d 1386 (9th Cir. 1985) 25

Volunteers of America-Minnesota-Bar None Ranch v. NLRB,
752 F.2d 345 (8th Cir. 1985) 25

Wallace v. Jaffree, 472 U.S. 38 (1985) 26

Witters v. Washington Dep't of Serv. for the Blind,
474 U.S. 481 (1986) 6

Page

Zobrest v. Catalina Foothills Sch. Dist.,
509 U.S. 1 (1993) 6

Statutory Authorities:

42 U.S.C. § 2000e-1(a) 27

42 U.S.C. § 2000e-2(e)(2) 27

Ohio Rev. Code Ann.
§ 3313.976(A)(4) 3,23
§ 3313.976(A)(6) 28
§ 3313.976(B) 23

Other Authorities:

Ken Badley, *The Faith/Learning Integration Movement*,
Journal of Research on Christian Education
(Spring, 1994) 20

The Christian Philosophy of Education
(Bob Jones University Press 2001) 21

Church & State, Oct. 1970 18

Edd Doerr and Albert J. Menendez,
Church Schools & Public Money (Prometheus Books 1991)
. 15,16

Edd Doerr and Albert J. Menendez,
Should Tax Dollars Subsidize Bigotry?
74 Phi Delta Kappan 165 (Oct. 1992). 29

Page

William Hasker, *Faith-Learning Integration: An Overview*, Christian Scholar's Review 23 (March 1992) 20

George R. Knight, *Seventh-day Adventist Education* in *Religious Schooling in America* (James C. Carper & Thomas C. Hunt eds., 1984) . . . 22

Douglas Laycock, *Towards a General Theory of the Religion Clauses: The Case of Church Labor Relations and the Right to Church Autonomy*, 31 Colum. L. Rev. 1373 (Nov. 1981) 26

Papers of Thomas Jefferson Vol. II 546 (Julian Boyd ed. 1950) 2

Frances R. A. Patterson, *Building a Conservative Base: Teaching History and Civics in Voucher-Supported Schools*, 82 Phi Delta Kappan 150 (Oct. 2000) 30

Frances R. A. Patterson, *Supreme Court: Enemy of Freedom* 29 J. L. & Educ. 405 (Oct. 2000) 30

Frances R. A. Patterson, *Teaching Intolerance: Anti-Catholic Bias in Voucher-Supported Schools*, 64 The Education Forum 139 (Winter 2000) 29

Valuegenesis Report IV, A Study of the Influence of Family, Church and School on the Faith, Values, and Commitment of Adventist Youth, North American Division Board of Higher Education and Board of Education, K-12 (1993) 16

Page

Ellen G. White,
Education (Pacific Press Publishing Ass'n 1903) 14

INTERESTS OF *AMICI CURIAE*[1]

The Council on Religious Freedom (CRF) is a nonprofit organization formed to promote religious liberty and church-state separation. Its board is composed of individuals who are active in religious affairs. Several board members have served on the governing boards of religious educational institutions and appreciate the need for those institutions to be free to convey their church's religious ideals.

The Northwest Religious Liberty Association (NRLA) is the advocacy agency of the North Pacific Union Conference of Seventh-day Adventists. It represents the Adventist Church and its constituent members and organizations with the purpose of protecting and advancing the principles of religious freedom in the Northwest, specifically, Alaska, Idaho, Montana, Oregon, and Washington. Within this region there are 140 Adventist elementary and secondary schools.

The Seventh-day Adventist Church State Council serves as the religious liberty educational and advocacy arm of the Adventist Church for a five state western region of the United States, including Arizona, California, Hawaii, Nevada, and Utah. Within this region there are 143 Adventist elementary and 49 secondary schools with a combined enrollment of 16,752 students currently. The Seventh-day Adventist Church

---

[1]Pursuant to United States Supreme Court Rule 37.3(a), counsel of record have filed letters with the Clerk of Court consenting to the filing of this brief. Pursuant to Rule 37.6, *amici curiae* state that no counsel for any party authored this brief in whole or in part and that no person other than the *amici curiae*, their members, and their counsel made a monetary contribution to the preparation or submission of this brief.

State Council defends the religious freedom interests of the Adventist Church, its institutions, and members generally.

This case involves financial aid to sectarian elementary and secondary schools in the form of vouchers. Because the NRLA and the Church State Council are charged with interpreting and applying Adventist teachings and principles regarding religious freedom, those *amici* desire to be heard.

The Interfaith Religious Liberty Foundation is a Sacramento, California, based nonprofit educational organization that promotes religious liberty and church-state separation through the development of curriculum materials.

INTRODUCTION AND SUMMARY OF ARGUMENTS

For the very reason they exist, these *amici* and members of their organizations are as passionately committed to religious education as any of the *amici* supporting petitioners. Many of their board members have served in administrative capacities having direct involvement in church-operated elementary and secondary schools, colleges and universities.

These *amici* oppose voucher programs for use at sectarian schools for at least two major religiously-based reasons. First, they share the concern expressed by Thomas Jefferson who so eloquently insisted that: "It is sinful and tyrannical for any man to be forced to support a religion to which he does not believe." Papers of Thomas Jefferson Vol. II 546 (Julian Boyd ed. 1950). In fact, these *amici* believe that contributions to one's own religion must be voluntary and not coerced by the state. As Justice Souter recalled in *Mitchell v. Helms*, 530 U.S. 793, 120 S. Ct. 2530, 2574 (2000) (Souter, J., dissenting), "Madison's and Jefferson's now familiar words establish[ed] clearly that liberty of personal convictions

requires freedom from coercion in support of religion, and this means that the government can compel no aid to fund it."

These *amici* contend Ohio's voucher program conflicts with the controlling opinion in *Mitchell v. Helms*, 530 U.S. 793 (2000), by directly aiding sectarian schools' religious activities and indoctrination. Therefore, it unconstitutionally advances religion.

Second, these *amici* believe that such voucher programs will result in compromising the church and its religious education mission by providing a reason and need for government to intrude into the affairs of religious organizations. Ohio's program, therefore, also burdens religion. In *Lemon v. Kurtzman*, 403 U.S. 602, 621 (1971), the Court noted:

> The history of government grants of a continuing cash subsidy indicates that such programs have almost always been accompanied by varying measures of control and surveillance.

The Ohio voucher program is no exception. ORC Ann. § 3313.976(A) provides, in part:

> The state superintendent shall register any school [for scholarship payments] that meets the follow requirements:
>
> (4) The school does not discriminate on the basis of . . . religion. . . .

Such a mandate applies both to admissions and employment policies precluding religious schools from making employment decisions based on religious beliefs and practices. The schools operated by *amici* could not exist without the freedom to require that faculty, administration, and all employees be

fully committed to the religious mission of the school.

Justice White, concurring in *Lemon*, stated that legislation providing assistance to any sectarian school which restricted entry on religious or racial grounds would, to that extent, be unconstitutional. 403 U.S. at 671 n.2. *See also Norwood v. Harrison*, 413 U.S. 455, 464 n.7 (1973). This same reasoning, applied to employment policies, would pose an insurmountable problem for *amici*'s religious schools. Not only are *amici* opposed to the Ohio program because of its intrusive effect clearly set forth in the existing law but because subsequent legislation may further intrude into the area of church autonomy.

ARGUMENTS

I. *MITCHELL v. HELMS* DOES NOT SUPPORT THIS VOUCHER PROGRAM.

Amici believe, from a religious standpoint, that it is improper for the state to compel taxpayers to support religious activities or religious viewpoints with which they do not agree or even ones with which they do. They also assert that current law prohibits taxpayer support of religious indoctrination, which is the end result of the Ohio voucher program.

The dissent below and petitioners contend that this Court's *Mitchell v. Helms*, 530 U.S. 793, 120 S. Ct. 2530 (2000), decision and recent decisions of this Court on which *Mitchell* is based require the validation of this voucher program. But actually, the controlling opinion in *Mitchell* requires that the program be found to violate the Establishment Clause.

As the court of appeals correctly held, "[w]hen a

fragmented Court decides a case and no single rationale explaining the result enjoys the assent of five Justices, 'the holding of the Court may be viewed as that position taken by those members who concurred in the judgment on the narrowest grounds.' *Marks v. United States*, 430 U.S. 188, 193 (1977)." Therefore, Justice O'Connor's opinion concurring in the judgment controls.[2]

In *Mitchell* Justice O'Connor continued to apply the test she articulated in her earlier majority opinion in *Agostini v. Felton*, 521 U.S. 203 (1997). Justice O'Connor stated in *Mitchell* that she "would decide today's case by applying the criteria set forth in *Agostini*." *Mitchell*, 120 S. Ct. at 2560. Under her test there would have to be sufficient statutory and administrative safeguards against diversion to the school's religious mission and to prevent items with religious content from being furnished to religious schools. *Id.* at 2568-72.

Petitioners argue that the Ohio Pilot Project Scholarship Program is constitutional because it is a neutral program which is based upon parental choice and does not directly aid sectarian schools. Each of these arguments, under careful scrutiny, is incorrect.

The program does not meet the neutrality requirement of *Mitchell*. As Justice O'Connor noted in *Mitchell*, the recent holdings of this Court as to "neutrality" require "evenhandedness in distribution." Such neutrality, Justice O'Connor states, "is relevant in judging whether a benefit

---

[2]It may be argued that because "neither Justice O'Connor nor Justice Breyer joined in any portions of the plurality opinion written by Justice Thomas . . ., the only binding precedent of *Mitchell* is the holding." *Steele v. Indus. Dev. Bd.*, 117 F. Supp. 2d 693, 706-07 (M.D. Tenn. 2000).

scheme so characterized should be seen as aiding a sectarian school's religious mission, but this neutrality is not alone sufficient to qualify the aid as constitutional." *Id.* at 2557-58.

The Sixth Circuit correctly observed that only schools which register and have been designated as program participants to enroll scholarship students under the pilot program could be selected by the parent. Private schools located within the boundaries of the school district, which meet applicable standards, may participate. However, there is no provision for public schools to participate within the school district where the student resides. It is true that public schools in districts adjacent to the district in which the voucher program is implemented under the Ohio statute are permitted to also register for the program, but none of the public schools adjacent to Cleveland has ever done so. Thus, as a practical matter, only private schools are available for students to select. There is, therefore, no real "evenhandedness." Students wishing to use their voucher at a public school are out of luck.

But, even if this Court found there was "evenhandedness in distribution" of such "scholarships," that alone does not validate the program. As Justice O'Connor noted in *Mitchell*, in deciding whether the program is a "genuinely independent" and "true private-choice program," as considered in *Witters v. Washington Dep't of Serv. for the Blind*, 474 U.S. 481 (1986), and *Zobrest v. Catalina Foothills Sch. Dist.*, 509 U.S. 1 (1993), the student beneficiary must *retain control* over whether the secular government aid will be applied toward the religious education. *Id.* at 2559.

But under the Ohio law, the state's check is sent to the private school and must be endorsed over to the recipient school by the parent. Thus, the so-called "private-choice" is

mere subterfuge. In reality, it is payment directly to the nonpublic school. If, in fact, a public school were a participating school, the law requires the check to be sent directly to the school in the name of the school, but the effect of the payment is the same as when sent to the nonpublic school.

It is unlikely that a "reasonable observer," aware that the state sends the check directly to the sectarian school and that the law mandates the parent endorse the check held by the school over to the recipient school, would see such an arrangement as being any different from that where the state pays the funds in check form with the school named as the payee. How, one may ask, are the Establishment Clause dangers any different in Ohio's program from one where the government sends funds directly to the general fund of a sectarian institution?

If all that is necessary is the required endorsement on a check sent to a religious institution, what, as Justice O'Connor suggests in *Mitchell*, *id.* at 2560, prevents direct money grants to churches (with church members endorsing the check) for the church's unfettered use? Justice O'Connor's says such a program "foreshadows the approval of direct monetary subsidies to religious organizations, even when they use the money to advance their religious objectives." *Id.* In fact, here it does not merely foreshadow such use, *that is exactly this case!*

The state's substantial payments of cash to a church's educational mission, particularly when not in any way limited by statutory or regulatory proscription against sectarian use of the funds, certainly advances religion. This is unmistakably so when the funding is not, as in *Mitchell* and *Agostini*, merely supplemental in character. It is rather a subterfuge

which cannot excuse the Court from its duty of "sifting through the details and determining whether the program offends the Establishment Clause." *Id.* What must be determined in each case is "whether the aid has the 'effect' of advancing or inhibiting religion."

As Justice O'Connor noted in *Mitchell*, in *Zobrest* "no government funds reached the school's coffers, aid did not relieve the school of expenses it otherwise would have assumed, and aid was not distributed to the school but to the child." *Id.* at 2557. But, under the voucher program here, just the reverse is true. State funds *do* reach the school's treasury; the aid *does* relieve the school of expenses it otherwise would have to assume; and aid *is not* sent to the child or his parent but to the school.

It is true that the *Mitchell* plurality found no problem with actual diversion of tax-derived funds for religious indoctrination. But Justice O'Connor's concurring opinion, joined by Justice Breyer and the three justices dissenting, makes clear that the majority of this Court in *Mitchell* find such use impermissible. As Justice O'Connor stated in her concurring opinion:

> Although "[o]ur cases have permitted some government funding of secular functions performed by sectarian organizations," our decisions "provide no precedent for the use of public funds to finance religious activities."

Id. at 2558. This statement is reflective of Justice O'Connor's concurrence in *Bowen v. Kendrick*, 487 U.S. 589, 601 (1988), where she pronounced that "*any* use of public funds to promote religious doctrine violates the Establishment Clause." [Citation omitted.]

As Justice O'Connor pointed out, in *Board of Educ. v. Allen*, 392 U.S. 236 (1968), the aid there in the form of textbooks loaned to students was permissible, "in part, on the fact that the aid had not been used to advance the religious mission of the recipient school." *Id.*

The O'Connor concurrence in *Mitchell* looked at the practical consequences of the program, that is whether the program was or was not "less like a direct subsidy, which is impermissible under the Establishment Clause, and more akin to the government issuing a paycheck to an employee who, in turn, donates a portion of that check to a religious institution." *Id.* at 2558. Here the program, from a practical viewpoint, smacks of a direct governmental subsidy -- not an individual's payment of personal funds the parent was otherwise entitled to spend.

Here, in the case of a low-income student, the aid provides 90% of that student's tuition to attend and fully participate in all classes and the school life. Thus, it represents much more than the type of supplemental aid as that in *Mitchell's* Chapter 2 program which "concerns only teaching tools that must [under the statute and regulations of Chapter 2] remain supplementary . . . ." Rather, here, the payment is more akin to the Community Education Program in *Grand Rapids Sch. Dist. v. Ball*, 473 U.S. 373 (1985), where "the government financed the entirety of . . . classes [in which] . . . religious indoctrination [may] take place. . . ." *Mitchell*, 120 S. Ct. at 2568.

Although Justice O'Connor concluded in *Mitchell* that a religious school teacher should be depended upon to abide by secular restrictions placed on governmental assistance, here there are no such restrictions. Unlike *Mitchell* and *Agostini*, there are no safeguards whatsoever that the funds will not be

used for religious activities and indoctrination. *Id.* at 2569-70.

But under Cleveland's program, not only are there absolutely no such safeguards, because nearly all of the tuition is paid by the state, but it is inevitable that the state will pay for both the secular and sectarian aspects of the child's education. It is true that in *Committee for Public Educ. and Religious Liberty v. Regan*, 444 U.S. 646 (1980), this Court did permit direct cash reimbursement to sectarian schools. But in *Regan* the Court carefully pointed out that the program there did not present "any appreciable risk of being used to transmit or teach religious views." *Id.* at 662. The Court stated that "the outcome would likely be different were there no effective means for insuring that the cash reimbursement would cover only secular services." *Id.* at 659.

It is true, as cases cited by petitioners demonstrate, that aid may be provided to certain aspects of a sectarian school's program. This is in recognition that sectarian schools perform secular functions. For this reason, some forms of aid as in *Zobrest, Agostini* and *Mitchell* have been deemed such as may be channeled to the secular without providing aid to the sectarian. "But the channel is a narrow one." *Committee for Public Educ. and Religious Liberty v. Nyquist*, 413 U.S. 756, 775 (1973).

The *Nyquist* Court thus recognized the narrowness of the channel of permissible aid and required a determination that the financial assistance provided by government would aid only secular functions of the sectarian school. Then, and only then, was the aid to religion considered indirect and incidental. Widening the channel to permit aid to the sectarian aspects of religious schools would destroy a core purpose of the Establishment Clause designed to protect religious freedom and thus a protection for religion itself.

Agreeing with Justice Souter with respect to the Court's continued "recognition of the special dangers associated with direct money grants to religious institutions," Justice O'Connor said:

> In fact, the most important reason for according special treatment to direct money grants is that this form of aid falls precariously close to the original object of the Establishment Clause's prohibition.

Mitchell, 120 S. Ct. at 2566. O'Connor pointed out that the First Amendment was directed at least against "sponsorship, financial support, and active involvement of the sovereign in religious activities." *Id.*

II. THE VOUCHER PROGRAM DIRECTLY AIDS RELIGIOUS ACTIVITIES AND INDOCTRINATION.

As this Court indicated in *Abington Township School Dist. v. Schempp*, 374 U.S. 203, 218 (1963):

> Our constitutional policy . . . does not deny the value or the necessity for religious training, teaching or observance. Rather, it secures their free exercise. But to that end it does deny that the state can undertake or sustain them in any form or degree. For this reason the sphere of religious activity has been given the two-fold protection, neither can it perform or aid in performing the religious function. The dual prohibition makes that function private.

But the Ohio voucher scheme, as we will demonstrate, unquestionably aids sectarian schools in performing their religious function.

We have demonstrated that, within the Cleveland School District, vouchers are not even usable at public schools. They are only accepted by registered private schools, most of which are religious. Statistically, if such programs were validated by this Court and extended to other parts of the nation, the participating schools would overwhelmingly be religious in nature.

According to statistics developed by the National Center for Education Statistics, nationwide 84.3% of all private school students attend religious schools.[3] The statistical breakdown identifies "Nonsectarian" schools representing the remainder, or 15.7% of students, which necessarily includes non-religious schools such as Montessori Schools, but by its terms must also fit some religious schools, such as Muslim and Jehovah's Witness, that do not fit any other category. Thus, the total number of students in religious schools is definitely higher than 85%.

Although the total number of students attending private schools is about 11.4% of all American students, the number of private schools is far higher, 23% of all U.S. schools.[4] If this Court approves tuition vouchers, funding will flow primarily to religious schools.

A. Tuition Vouchers Fund The Religious Mission Of Religious Schools.

The constitutional theory for approving tuition vouchers for

---

[3]*See* Council for Private Education web site referencing statistics provided by the National Center for Education Statistics. App. at 1a-3a.

[4]Council for Private Education. App. at 1a-2a.

students to attend religious schools is based on a myth, a false theoretical construct -- that the public can by tuition vouchers avoid funding the religious mission of sectarian schools. This may sound plausible as a theoretical proposition, but it has no basis in fact. Religious schools themselves do not perceive a distinction between the secular and sectarian. Instead, they regard schools as a church ministry, integral to the church and to its religious and evangelistic mission. This is true across denominational lines. The distinction between secular education and religious mission is purely theoretical and artificial; it has no basis in reality.

First, consider what various denominations and textbook publishers say about their own schools. The Seventh-day Adventist Church operates some 1,100 elementary and secondary schools in the United States with a combined enrollment of about 90,000 students. An official church policy is entitled: "The Seventh-day Adventist School As An Integral Part Of The Seventh-day Adventist Church."[5] This policy recites various scriptural and religious explanations for why the school is the church. These policies reflect the belief that education and spiritual redemption are the same work. Thus, the Seventh-day Adventist school system has "as its basic evangelistic task the education and redemption of the children and youth of the Church."[6] The educational task is also defined by reference to Matthew 28:18-20, a passage known as The Great Commission where Jesus instructs his disciples to "teach all nations" the spiritual truths and practices of the Bible and to baptize the converts.

---

[5]North American Division Working Policy, K-12 Education Policies F-05-20, 1998-99. App. at 4a-10a.

[6]*Id.* App. at 8a.

An authoritative Seventh-day Adventist source, a book titled simply *Education*, declares:

> In a knowledge of God all true knowledge and real development have their source. *Whatever line of investigation we pursue*, with a sincere purpose to arrive at truth, we are brought in touch with the unseen, mighty Intelligence that is working in and through all. *The mind of man is brought into communion with the mind of God, the finite with the Infinite. . . . In this communion is found the highest education.* [Emphasis added.]

Ellen G. White, *Education* 14 (Pacific Press Publishing Ass'n 1903). White's writings are regarded by Seventh-day Adventists as uniquely inspired and authoritative although not placed on the same level as the Bible.

The subject may be arithmetic, handwriting, or some other ostensibly "secular" subject, but if it is pursued in a pervasively Christian context, with truth as the sincere pursuit, such "secular" subjects will connect the student's mind with the mind of God. There is nothing secular about connecting with the mind of God.

The following is cited in official church policies from the same source:

> To restore in man the image of his Maker, to bring him back to the perfection in which he was created, to promote the development of body, mind and soul, that the divine purpose in his creation might be realized -- this was to be the work of redemption. This is the object of education, the great object of life.

Id. at 16, 17. *See* App. at 7a-8a.

Here, the work of education and redemption are regarded as identical. Indeed, physical and mental development, which may be regarded as "secular," are considered an integral part of redemption, and thus spiritual. In the Adventist world view, it is simply impossible to separate the secular from the sacred in education.

Seventh-day Adventists are not alone in this philosophy. One of the largest textbook publishers, Bob Jones University Press, *see* App. at 17a-22a, explains the Christian school this way:

> The work of the Christian school is an extension of the Christian educational ministries of the Christian home and the church. Its purpose, therefore, is the development of the student in the image of God. This purpose determines both the content and the means of instruction.

App. at 17a.

The largest private school system in the world and in the United States is operated by the Roman Catholic Church. Pope Pius XI, in his encyclical on the Christian Education of Youth, wrote:

> For it is necessary, if we may use the words of Leo XIII, not only at certain hours to teach Catholic religion to children but that all other subjects must also be made fragrant with the odor of piety. If this be not done, if this holy habit should not pervade and permeate the souls of both teachers and pupils, little benefit will accrue from any teaching but generally very great harm.

Edd Doerr and Albert J. Menendez, *Church Schools & Public Money* (Prometheus Books 1991). *See also* the Declaration on

Christian Education issued by Vatican II, App. 34a.

In the religious school, the teacher is expected not merely to embrace the faith intellectually but to live it and to convey a life of faith by example, not just precept. The teacher must convey the faith as much by who she is as by the intellectual content conveyed. This is true in religious schools of all denominations. Rev. John McKenzie, then chair of the theology department at the University of Notre Dame, described the Catholic school this way:

> The Roman Catholic schools have always placed religious education as the primary purpose of the schools with no attempt to mask this under some other purpose. . . . Children also learn the way of worship; they are taught respect and reverence for prelates, clergy, and religious. *They are daily reminded of their identity as Catholics. They grow up in an atmosphere of Roman Catholic traditions and attitudes which are communicated not so much by instruction as by prolonged close association under the direction of professional religious persons.*

Id. (emphasis added).

Formal instruction in religion isn't regarded as the primary means of transmitting the faith. Instead, the faith is transmitted by the example and influence of the teachers. A study of Seventh-day Adventist schools documents that "teachers in Adventist schools believe that teaching is God's choice for their lives and they view their work as ministry." *Valuegenisis Report IV, A Study of the Influence of Family, Church and School on the Faith, Values, and Commitment of Adventist Youth* 70 (North American Division Board of Higher Education and Board of Education K-12 1993). Indeed, this perspective is firm church policy in that only committed

church members are eligible to teach in church schools.

The concept of creating a religious "atmosphere" appears throughout the literature on integrating faith and learning. This atmosphere is a metaphor that encompasses a variety of experiences, including: (1) the pervasiveness of a religious world view applied consistently across curriculum content; (2) the importance of the influence of teachers as living witnesses to, and examples of, the faith; and (3) the importance of the community and the culture in reinforcing and transmitting the faith.

This latter point is poignantly reflected in the excerpts above. Yet, it is a consideration easy to overlook in our individualistic culture. The culture of the church and the church school is far less individualistic than American society at large. There is a tremendous sense of identity and belonging to the religious community that plays a vital role in the transmission of religious faith and values. Tuition vouchers inevitably finance not just individuals but support those individuals as integral parts of a faith community.

The Southern Baptist philosophy sees education as "uniting home, church and school in Jesus Christ" through "kingdom Education" so that the generations to come will know the truth of God's word and not forget His works, nor be taken captive by the vain philosophies of their day. This makes no distinction between the school and the church. They are part of the same mission and purpose: advancing the kingdom of God and God's truth. *See* App. 28a.

The National Christian School Association forcefully rejects any notion that member schools provide a secular education. Instead, it declares:

> Christian education is much more than just a Bible class added to the state's curriculum or daily devotional services added to an otherwise secular environment. Christian education is about the intersection of faith with every part of the curriculum and each activity that the school sponsors.

See App. at 27a.

The Lutherans operate one of the largest Protestant school systems in America. *See* App. at 31a. One Lutheran educator has articulated the Lutheran philosophy:

> What's Lutheran in Education?. . . That the Bible be dominant not only as basic subject matter, but also as a dynamic frame of reference and an orienting force which *Christianizes every other subject in a curriculum.*

Church & State, Oct. 1970, at 23 (emphasis added).

Another Lutheran educator said:

> In the Christian view, there can be no artificial divorce between sacred and secular learning. . . . Christian doctrine will, therefore, permeate the entire program.

Id.

The Lutheran Church-Missouri Synod's publishing arm is Concordia Publishing House. Concordia "has a deliberate, distinctive goal to provide you with quality resources that equip you for successful teaching and active ministry." According to this Lutheran philosophy, teaching and ministry are inseparable. Accordingly, Concordia promises: "All our materials are Bible-based and Christ-centered so that your

efforts to include Christ in all aspects of education are successful." *See* App. at 32a.

This is consistent with the philosophy expressed by the Lutheran Church-Missouri Synod District and Congregational Services which describes its education function as "School Ministry." The mission of this ministry is evangelistic "so that . . . children may be equipped as disciples of Jesus Christ." *See* App. at 32a.

Christian Schools International is an organization of 475 Reformed Christian Schools with a combined enrollment of over 100,000 students. Its motto is "Advancing Christian education and supporting schools in their task of teaching students to know God and His world and to glorify Him through obedient service." They publish textbooks that "incorporate a clear Biblical perspective on the subject area." *See* App. at 33a.

Across denominational boundaries, and including some groups that approve of tuition vouchers, the educational philosophy and practice is that religious schools provide religious, not secular, education. Funding religious schools through vouchers would make the public a sponsor of, and partner in, religious education.

B. The Philosophy Of Integrating Faith And Learning Crosses Denominational Boundaries And Is Profoundly Theological.

There is a profound theology behind religious education. It is a theology of integrating faith and learning that has been the subject of countless scholarly articles. Several points are worth noting briefly because of their relevance to this discussion. First, integration is not new but was discussed at

least as early as the early church father, Tertullian. Ken Badley, *The Faith/Learning Integration Movement*, Journal of Research on Christian Education 13, 14 (Spring, 1994). Second, integration of faith and learning is practiced by a wide spectrum of denominations including evangelical, Roman Catholic, fundamentalist Protestant, and Reformed Protestants. *Id.* at 16.

The scholarly discussion of the integration of faith and learning is evidence that what is contained in the above quoted official church policy statements is actually put into practice in the curriculum and in the classroom. It is useful then to review a few brief observations about "integration."

According to Badley, integration means more than mere "interaction" between faith and learning. It is more than an engagement or dialogue between the two. Instead, faith and learning are seen as a "coherent whole from the ground up." *Id.* at 17. In short, the task of integrating faith and learning is "to view -- and to engage in -- all of life and learning from the vantage point of Christian faith." *Id.* at 31.

William Hasker defines integration "as a scholarly project whose goal is to ascertain and to develop integral relationships which exist between Christian faith and human knowledge." William Hasker, *Faith-Learning Integration: An Overview*, Christian Scholar's Review 23 (March 1992). The existence of a "single reality, all of which is created by God, and under His dominion" is a central theological premise of integration. *Id.* Hasker strongly implies that the divisions between faith and science, as between secular education and religion, is an artificial division, created, or at least as fostered, by those with a secular world view. *Id.*

C. The Textbooks And Curriculum In Religious Schools Further Evidence The Pervasive Religious Atmosphere Of Such Schools.

A closer look at religious textbooks and curriculum provides further evidence of just how pervasive religion really is in religious schools:

> The Christian school curriculum includes astronomy, physics, chemistry, biology, mathematics, and related subjects because they provide a knowledge of God's nature and His work in this world. In the curriculum of the Christian school, the voice of creation joins with that of the written revelation in praise of the glory and goodness of God.

The Christian Philosophy of Education (Bob Jones University Press 2001). App. at 20a.

One of the largest Christian textbook publishers, A Beka Book, expresses its approach to science this way:

> While secular science textbooks present modern science as the opposite of faith, the A Beka Book science texts teach that modern science is the product of Western man's return to the Scriptures after the Protestant Reformation, leading to his desire to understand and subdue the earth, which we say is the orderly, law-abiding creation of the God of the Bible.

App. at 25a. Its science curriculum, therefore,

> presents the universe as the direct creation of God and refutes the man-made idea of evolution. Further, the books present God as the Great Designer and Lawgiver,

without Whom the evident design and laws of nature would be inexplicable.

Id. *See also* App. 23a-26a.

Seventh-day Adventist educators, for example, have developed textbooks throughout the curriculum in science, reading, social studies, handwriting, and religion in an effort to fully integrate faith and learning. George R. Knight, *Seventh-day Adventist Education* in *Religious Schooling in America* 103 (James C. Carper & Thomas C. Hunt eds., 1984). *See* App. at 11a-14a. The science curriculum for Grades 5 and 6 is entitled: "Discover God's World, Series A," and "Discover God's Creation, Series B." For grades 7 and 8, the titles are "Explore God's World, Series A" and "Explore God's Creation, Series B." App. at 14a.

The integration of faith and learning applies equally to other areas of curriculum. For example, Seventh-day Adventist handwriting curricula have children writing Bible passages. Book titles include: *God Made My World, Words of Jesus*, and *Words of Love*. Seventh-day Adventist Curriculum Catalogue, App. at 11a. The reading series emphasizes reading selected to inculcate faith and build character, including *In the Beginning, God Made It so,* and *Love Your Neighbor*. Indeed, reading curriculum content must "[b]e in harmony with and promote Biblical doctrine and Seventh-day Adventist goals of service, spiritual values and attitudes." App. at 12a. This is typical of religious school curriculum everywhere.

Finally, the integration of faith and learning is not just an abstract goal, but a basic reality in religious schools across the denominational and theological spectrum. As such, the religious mission of the school and church is implemented

throughout the school day, in all aspects of curriculum and instruction, through the example of the teachers and through the atmosphere of a religious culture and climate created in the school. Tuition vouchers, if approved, will inevitably finance and advance religion directly.

III. THE VOUCHER PROGRAM IMPLEMENTED IN OHIO VIOLATES PRINCIPLES OF RELIGIOUS AUTONOMY AND COMPROMISES THE CHURCHES' RELIGIOUS EDUCATION MISSION.

As noted above, for a sectarian school to participate in Ohio's Pilot Project Scholarship Program, under § 3313.976(A), the school must be registered by the state superintendent and must not, under subsection (4), "discriminate on the basis of . . . religion. . . ." Under § 3313.976(B), "[t]he state superintendent shall revoke the registration of any school if, after a hearing, the superintendent determines that the school is in violation of any provision of division (A) of this section." Thus, the state is to make a determination as to the termination of a sectarian school if the superintendent has information that a religious school discriminates on the basis of religion.

Religious organizations have long claimed the right to discriminate in the hiring and maintaining of their preaching and teaching ministries. This is sometimes referred to as the constitutional "ministerial exception" but has not been limited to members of the clergy. *EEOC v. Catholic Univ. of America*, 83 F.3d 455, 461 (D.C. Cir. 1996). Such organizations also have long believed they must be permitted to discriminate on a religious basis as to membership and enrollment within their institutions. In a case involving the hiring of a minister, the Seventh-day Adventist Church successfully argued this issue before the Fourth Circuit Court

of Appeals in *Rayburn v. General Conference of Seventh-day Adventists*, 772 F.2d 1164 (4th Cir. 1985). That court stated:

> As a general rule, if the employee's primary duties consist of teaching, spreading the faith, church governance, supervision of a religious organization or participation in religious ritual and worship, he or she should be considered "clergy." Bagni, *Discrimination in the Name of the Lord: A Critical Evaluation of Discrimination by Religious Organizations*, 79 Columbia L. Rev. 1514, 1545 (1979).

Id. at 1169. *See also McClure v. Salvation Army*, 465 F.2d 553 (5th Cir. 1970); *EEOC v. Southwestern Baptist Theological Seminary*, 485 F. Supp. 255 (N.D. Tex. 1980), *aff'd in part and rev'd in part*, 651 F.2d 277 (5th Cir. 1981), *cert. denied*, 456 U.S. 905 (1982); *Maguire v. Marquette University*, 627 F. Supp. 1499 (E.D. Wis. 1986), *modified*, 814 F.2d 1213 (7th Cir. 1987); *Miller v. Catholic Diocese of Great Falls*, 728 P.2d 794 (Mont. 1986). But the constitutional exemption from anti-discrimination laws afforded to churches under the Free Exercise Clause has its *quid pro quo*. As churches are shielded from government involvement in their sectarian ministries, the Establishment Clause sets churches apart from other private organizations and prevents religious organizations from being recipients of direct funding by tax-derived funds. *See Catholic Bishop of Chicago v. NLRB*, 559 F.2d 1112, 1131 (7th Cir. 1977).

Establishment Clause violations may arise both when government *benefits* religious organizations as well as when government potentially *burdens* religion. *See St. Elizabeth Community Hosp. v. NLRB*, 708 F.2d 1436, 1441 n.3 (9th Cir. 1983). We have demonstrated that the Ohio law benefits religion. We now demonstrate how it burdens religion.

The anti-discrimination requirements of Ohio's voucher law are troubling because they may well strip away the constitutional shield prohibiting the state from meddling in and destroying the "religious autonomy" guarantees. In *NLRB v. St. Louis Christian Home*, 663 F.2d 60, 64 (1981), the court found that even though the Christian Church perceived its religious mission included caring for unfortunate children, it was not entitled to church autonomy protection from governmental intrusion since it hired employees without regard to religion. But the Ohio statute here specifically requires such non-discriminatory hiring.

Similar analyses contributed to defeating claims to church autonomy protection when employees were chosen without regard to religious affiliation. *See Tressler Lutheran Home for Children v. NLRB*, 677 F.2d 302, 307 (3d Cir. 1982); *NLRB v. Salvation Army of Mass. Dorchester Day Care*, 763 F.2d 1, 6-7 (1st Cir. 1985); *Volunteers of America-Minnesota-Bar None Ranch v. NLRB*, 752 F.2d 345, 348 (8th Cir. 1985); and *Volunteers of America, Los Angeles v. NLRB*, 777 F.2d 1386, 1389 (9th Cir. 1985). The federal courts compared each of these cases with *NLRB v. Catholic Bishop of Chicago*, 440 U.S. 490 (1979), where "[t]he religious character of the enterprise . . . existed at all three levels: the church, the church-operated institution, and the institution's employees." *St. Louis Christian Home*, 663 F.2d at 64.

Church control over the religious affiliation of the teaching staff and the imposition of religious tests to determine hiring, promotion, and termination is critical to the operation of sectarian schools operated by religious organizations. As Professor Douglas Laycock stated:

> Church labor relations rather plainly fall within the right of church autonomy. Deciding who will conduct the

> work of the church and how that work will be conducted is an essential part of the exercise of religion. In the language of the Supreme Court's autonomy cases, labor relations are matters of "church administration"; undoubtedly, they affect "the operation of churches."

Douglas Laycock, *Towards a General Theory of the Religion Clauses: The Case of Church Labor Relations and the Right to Church Autonomy*, 31 Colum. L. Rev. 1373, 1378 (Nov. 1981). He further contended, *id.* at 1399-40, that

> anti-discrimination laws initially prevent the church from deciding whether to discriminate among its employees and applicants. Many churches may wish to discriminate on the basis of religion. Equally important, churches that do not want to discriminate at all are deprived of the chance to define discrimination. Some may oppose unequal treatment of individuals because of race, sex, or national origin, but want to be free to act on any facially neutral basis even if its has a disparate impact on racial, sexual, or ethnic groups.

This "discrimination" concern is no mere theoretical problem. It became a major issue in Ohio in a case that reached this Court in *Ohio Civil Rights Comm'n v. Dayton Christian Sch., Inc.*, 477 U.S. 619 (1986).

The Ohio voucher law presents another of "the myriad, subtle ways in which Establishment Clause values can be eroded." *Wallace v. Jaffree*, 472 U.S. 38, 60 (1985).

Amici here urge that Ohio's voucher statute fosters impermissible governmental entanglement with religion in both substantive and procedural dimensions. Paraphrasing the Ninth Circuit in *Bollard v. California Province of Soc'y of*

Jesus, 196 F.3d 940, 948-49 (1999), on the substantive level the law directly implicates "the church's freedom to choose its . . . [teachers]," and its religious educational mission is severely compromised by the anti-discrimination proviso. "A religious organization's decision to employ or to terminate employment of a minister is at the heart of its religious mission." *Id.*

Any church-operated elementary or secondary school seeking registration to receive voucher students would be required to decide whether or not it would waive its right to select, discipline, and terminate its teachers for religious reasons free from governmental interference. Such a right is recognized in Title VII which exempts religious educational institutions from its religious discrimination proscriptions. *See* 42 U.S.C. § 2000e-1(a) and § 2000e-2(e)(2).

It has been said that "[a] church is always free to burden its activities voluntarily through contracts. . . ." *Minkus v. Baltimore Annual Conference*, 894 F.2d 1354, 1359 (1990). But for the state to manipulate such a choice that "would significantly . . . rearrange the relationship between church and state" raises very serious First Amendment concerns. *EEOC v. Roman Catholic Diocese of Raleigh, N.C.*, 213 F.3d 795, 801 (4th Cir. 2000). The anti-discrimination mandate of the Ohio law clearly results in state interference with church administration of its schools and interferes with the selection of personnel deemed to be within the constitutionally protected category of the "ministerial exception." It thus is violative of Free Exercise principles. *See EEOC v. Catholic Univ. of America*, 83 F.3d at 462.

Procedurally, "the prospect of future investigation and litigation [by the state superintendent] would inevitably affect to some degree the criteria by which future vacancies . . . will

be filled" in participating sectarian schools. *Id.* at 467. This would likely cause religious schools registered to participate in the voucher program to act in the future "'with an eye to avoiding litigation or bureaucratic entanglement rather than upon the basis of their own personal and doctrinal assessment of who would best serve the needs' of the . . . [school]." *Id.* The dangers of procedural entanglement become acute when there is also substantive entanglement, as here. *Bollard*, 196 F.3d at 949.

Amici understand it is critical to petitioners' "neutrality" argument that voucher programs they defend proscribe all forms of discrimination, including religious discrimination in both student enrollment and teacher employment at private voucher schools, as it must at public schools. But this underscores why such a program violates the "spirit of freedom for religious organizations [and] independence from secular control or manipulation" reflected in this Court's jurisprudence. *Kedroff v. St. Nicholas Cathedral*, 344 U.S. 94, 116 (1952).

Under the plain reading of the anti-discrimination proviso of the Ohio statute, Adventist schools would be excluded from participation because they, like many other religious schools, require teachers to be co-religionists, consistent with the philosophy of integrating faith and learning.[7]

Section 3313.976(A)(6) of the law provides that the superintendent is to terminate a school's registration to receive voucher students if it is found that the school teaches "hatred." Such a requirement implicates the religious curriculum

---

[7]North American Division Working Policy, K-12 Education Policies F 0530 Nondiscrimination Exception-Employment, App. at 10a.

directly. Many faith traditions teach some form of exclusivity -- that their religion is the only truth or is the best expression of truth and that some other religions are wrong.[8] Frances R. A. Patterson has documented the widespread anti-Catholic bias in some conservative Christian schools. This research examined textbooks widely used in Christian schools.[9]

In an earlier survey, Edd Doerr and Albert J. Menendez found evidence of bias in textbooks from Christian publishers against a wide range of religious groups that some may consider "hatred." A few examples must be cited, albeit reluctantly: repeatedly referencing to Catholic teachings as "blasphemous" and "pagan;" The Episcopalian religion criticized as "dead in ritualism and rationalism;" and evidence of the ancient charges of deicide against the Jewish people."[10]

What constitutes teaching hate, of course, is very subjective and lends itself to biased judgments. Scholars have documented offensive teachings about a wide range of social, political, and historical issues in Christian textbooks which would open a fierce debate as to whether they constitute hate. Such topics include the condemnation of abortion and homosexuality, teaching about the civil rights movement,

---

[8]Christian schools will cite the Gospel of John 14:16 where Jesus said: "I am the way, the truth and the life. No man cometh to the Father but by me."

[9]Patterson, Frances R. A., *Teaching Intolerance: Anti-Catholic Bias in Voucher-Supported Schools*, 64 The Educational Forum 139-49 (Winter 2000).

[10]Edd Doerr and Albert J. Menendez, *Should Tax Dollars Subsidize Bigotry?* 74 Phi Delta Kappan 165 (Oct. 1992).

attacks on the U.S. Supreme Court and judicial review.[11]

At best, the Ohio provision may exclude religious schools that teach views of exclusivity. At worst, the excluding of religious schools perceived as teaching hate permits, and perhaps requires, exploration by the state into the content of religious studies at registered sectarian schools.

This does not mean taxpayer support of teaching hate may ever be permitted -- certainly not! But the practical result is to bring the entire activity of religious schools under governmental scrutiny. This poses an enormous threat to the autonomy of church-operated schools, especially with regard to such sensitive and divisive issues at the core of the religious mission.

CONCLUSION

For the reasons stated above, the judgment of the Sixth Circuit Court of Appeals should be affirmed.

Dated: December 13, 2001 Respectfully submitted,

LEE BOOTHBY
Counsel of Record
4545 42nd St., NW, Suite 201
Washington, DC 20016
(202) 363-1773

---

[11]Frances R. A. Patterson, *Building a Conservative Base: Teaching History and Civics in Voucher-Supported Schools*, 82 Phi Delta Kappan 150 (Oct. 2000); Frances R. A. Patterson, *Supreme Court: Enemy of Freedom* 29 J. L. & Educ. 405 (Oct. 2000).

ALAN J. REINACH
Pacific Union Conference of
Seventh-day Adventists
2686 Townsgate Road
Westlake Village, CA 91359
(805) 497-9457

Counsel for *Amici Curiae*

APPENDIX

APPENDIX ITEMS:

Council For American Private Education Website
www.capenet.org/facts.html

Private School Enrollment Continues to Climb

September 2001 - Six million students -- 11.4 percent of the nation's K-12 population -- attended private elementary and secondary schools in 1999, according to officials at the National Center for Education Statistics (NCES).

Since 1989, the private school enrollment figure has risen 15.8 percent, about the same as the 15.6 percent public school growth rate for the same 10-year period.

The figures were released last month in connection with NCES's annual projection of education statistics, a document that provides actual enrollment counts through 1999 and projections through 2011. Total national K-12 enrollment is expected to increase slightly from 53.1 million to 53.4 million between now and 2005, the projected peak year, but the degree and timing of enrollment shifts will vary at the elementary and secondary levels. Public and private K-8 enrollment is set to drop about 1 percent between 2001 and 2011, while 9-12 enrollment is expected to grow by nearly 7 percent through 2006, when it will then begin a gradual decline.

The NCES 10-year enrollment forecast presumes a static 11 percent share of the nation's students will attend private schools throughout the projection period.

On the teacher front, NCES is predicting that 3.65 million elementary and secondary school teachers will be employed nationally in 2011, an increase over 2001 levels of 87,000 teachers in public schools and 11,000 in private schools.

Also last month, NCES published the results of the biennial private school survey (PSS) conducted by the U.S. Census Bureau in the 1999-00 school year. The survey identified 27,223 private elementary and secondary schools, about 23 percent of all schools in the country, and nearly 5.2 million students. (Though derived from the same Census Bureau survey, the PSS enrollment figure for 1999 is about 800,000 less than the figure published in the NCES projection document principally because the latter includes some pre-K students in its enrollment counts for both public schools and private schools.)

The PSS report showed some significant demographic shifts within the world of private education. Since 1989, conservative Christian schools have seen an astounding increase of 46 percent in enrollment. The 245,000 additional students in those schools accounted for 75 percent of the total rise in private school enrollment during the past decade. Other types of private schools that posted noteworthy percentage increases in enrollment during the same timeframe included Episcopal schools (37 percent) and nonsectarian schools (26 percent).

Source of data: National Center for Education Statistics

Where do private school students go to school?

	89-90	99-00
Catholic	54.5%	48.6%
Nonsectarian	13.2%	15.7%
Conservative Christian	10.9%	15.0%
Baptist	5.8%	6.1%
Lutheran	4.4%	4.3%
Jewish	3.2%	3.3%
Episcopal	1.7%	2.2%
Seventh-day Adventist	1.6%	1.2%
Calvinist	0.9%	0.8%
Friends	0.3%	0.3%

SEVENTH-DAY ADVENTSIT CHURCH
K-12 EDUCATION POLICIES

F 05 Philosophy of Education

F 05 01 Philosophy---The Seventh-day Adventist Church recognizes God as the ultimate source of existence and truth. In the beginning, God created in His image a perfect humanity, a perfection later marred by sin. Through Christ and His Spirit, God determined to restore humanity from its lost state. Through the Bible, He has revealed His will to the world, a revelation that supercedes human reason. Through His Church on earth, He seeks the lost for His kingdom.
The basic tenets of the Seventh-day Adventist Church, as well as the inspired writings of Ellen G. White, are directed toward God's restorative plan for fallen humanity. The Church conducts its own system of education to engender belief in these tenets, within the context of one's personal relationship with Jesus Christ, and to foster a desire to share that relationship with others.

Made in God's image, every human being, although fallen, is endowed with attributes akin to those of the Creator. Therefore, Seventh-day Adventist education seeks to nurture thinkers rather than mere reflectors of other's thoughts; loving service rather than selfish ambition; maximum development of one's potential; and an appreciation for all that is beautiful, true, and good.

An education of this kind imparts far more than academic knowledge. It is a balanced development of the whole person. Its time dimensions span eternity. In Seventh-day Adventist education, homes, schools, and churches cooperate together with the divine agencies in preparing

learners for citizenship here on earth and in the New Earth to come. *

---

*This statement is an abridgement of the complete philosophy statement found in the General Conference *Working Policy*.

F 05 05 Mission Statement---The Seventh-day Adventist Church in North America operates a system of elementary and secondary education that began in 1872. The unique philosophy of Christian education of the Church is based on the Scriptures and the writings of Ellen G. White. All children and youth have been entrusted by the Church to the education system for spiritual nurture and educational excellence.

The primary aim of Seventh-day Adventist education is to provide opportunity for students to accept Christ as their Savior, to allow the Holy Spirit to transform their lives, and to fulfill the commission of preaching the gospel to all the world.

The education program is predicated on the belief that each student is unique and of inestimable value, and on the importance of the development of the whole person. Students are educated to accept service as a way of life, to be sensitive to the needs of the people in the home and society, and to become active members of the Church.

F 05 10 Goals for Curriculum in Seventh-day Adventist Schools ---The following goal statements have been established to support the unique philosophy of Seventh-day Adventist education.

Acceptance of God and His Word---Each student will surrender his or her whole life to God through conversion; use the Bible as a basis for a relationship with Jesus Christ and an authoritative guide in all areas of life.

Commitment to the Church---Each student will desire

to know, live out, and share the basic tenets of the Seventh-day Adventist Church.

Family and Interpersonal Relationships---Each student will develop a sense of self-worth, along with skills in interpersonal relationships needed for meeting the responsibilities of family membership, and respond with sensitivity to the needs of others.

Responsible Citizenship---Each student will develop an understanding of multi-cultural diversity and historical heritage, and a working knowledge of governmental processes, while affirming a belief in the dignity and worth of others and a responsibility for one's local, national, and global environments.

Healthy Balanced Living---Each student will accept personal responsibility of achieving and maintaining optimum physical, mental, and spiritual health.

Intellectual Development--- Each student will adopt a systematic, logical approach to decision-making and problem-solving based on a body of scientific, mathematical, and historical knowledge, within the context of a biblical perspective.

Communication Skills---Each student will acquire optimum competency in verbal and nonverbal communication, in the use of information technology, and in effective communication of one's faith.

Life Skills---Each student will function responsibly in the everyday world, using Christian principles of stewardship, economy, and personal management.

Aesthetic Appreciation---Each student will develop an appreciation of the beautiful, both in God's creation and in human expression, while nurturing individual ability in the fine arts.

Career and Service---Each student will develop a strong work ethic and an appreciation of the dignity of service, along with an awareness of career options and

opportunities, as they relate to one's personal involvement in the mission of the Church.

F 05 15 Objectives of Seventh-day Adventist Education---The Seventh-day Adventist Church desires to provide for all its youth an education within the framework of the science of salvation. The fundamentals and common branches of knowledge are to be studied so that proficiency is achieved and a high quality of teaching is maintained.

The Seventh-day Adventist elementary school will assist each child to develop 1. a love and appreciation for the privileges, rights, and responsibilities guaranteed each individual and social group, and 2. a wholesome respect and attitude for each unit of society---home, church, school, and government. The elementary school will offer an organized program to ensure adequate development leading toward total spiritual, physical, mental, and emotional health and a basic core of skills and knowledge for everyday living.

The Seventh-day Adventist secondary school, predicated on the results obtained through the elementary school with character building as an undergirding structure, will endeavor to operate realistically for each student in the upgrading and maintenance of health, in the command of fundaments learning processes, in the teaching of worthy home membership, vocational skills, civic education, worthy use of leisure, and ethical maturity. The secondary school implementing the church philosophy will seek for objectives of spiritual dedication, self-realization, social adjustment, civic responsibility, and economic efficiency.

F 05 20 The Seventh-day Adventist School As An Integral Part of the Seventh-day Adventist Church---Seventh-day Adventist schools are an integral part of the Seventh-day Adventist Church in the following ways:

1. "To restore in man the image of his Maker, to bring him back to the perfection in which he was created, to promote the development of body, mind, and soul, that the

divine purpose in his creation might be realized—this was to be the work of redemption. This is the object of education, the great object of life."—(*Education*, pp. 15, 16)

2. The commission given in Matthew 28:18-20 states that the basic task of the Church is an educational task.

3. The Seventh-day Adventist school system has as its basic evangelistic task the education and redemption of the children and youth of the Church. Its object is to promote the development of character and to direct the youth to a "knowledge of God, the Creator, and of Christ, the Redeemer, as they are revealed in the sacred word." (*Education*, p. 17) In pursuing this task the school system has a greater continuing influence than any other aspect of the church program.

4. The school is concerned about the whole person—body, mind, and soul—and seeks to ensure that youth receive a balanced physical, mental, moral, social, and practical education.

5. The school system emphasizes the principle of service to God and man. It prepares youth for a life of service whether as employees of the Church or as active, contributing lay members.

a. The students generally come from Seventh-day Adventist homes and/or are baptized members of the Seventh-day Adventist Church.

b. In addition, the school may also serve as a mission outreach to the community. When a school desires to recognize this potential ministry to the community, non-Seventh-day Adventist youth may be enrolled in larger numbers. This type of program carries additional responsibility as detailed in F 45 10.

c. In some instances a church may operate a "mission" school which is an evangelistic outreach program to families in the community. A mission school is not limited in the number of non-Seventh-day Adventist students that may

be enrolled.

6. The members of the school boards and conference board of education are members of the Seventh-day Adventist Church.

a. The school board is composed of members of the Seventh-day Adventist who represent a cross section of the school constituency and who are supportive of Seventh-day Adventist education.

b. The conference and union conference boards of education are composed of representatives of various church institutions and/or conferences, lay members of the Church, and church officials.

7. Educational employees must be active members of the Seventh-day Adventist Church in regular standing, and committed to the program of the Church. Employment qualifications, licenses and credentials, salary and wages, benefits, and retirement are all established and regulated by the policies which cover all other denominational workers.

8. The uniquely designed curriculum in Seventh-day Adventist schools is developed by church educators who ensure that the educational objectives of the Church are achieved.

a. It is based on a distinctive Seventh-day Adventist philosophy with a strong commitment to academic excellence.

b. It utilizes the best in current curricular research.

c. It reflects an awareness of the principles of human growth and development and the worth and dignity of each student.

d. It emphasizes a process which encourages, guides, and sustains the learner as he seeks to relate to the Creator and to his fellow human beings.

9. The title to school buildings and property is held by the conference association which is the legal

corporation that holds title to all church and school properties.

F 05 25 Nondiscriminating Policy---Admission of Students---The Seventh-day Adventist Church in all of its church schools, admits students of any race to all rights, privileges, programs, and activities generally accorded or made available to students at its schools, and makes no discrimination on the basis of race, color, ethnic background, country of origin or sex in administration of education policies, applications for admission, scholarship or loan programs, and extracurricular programs.

F 05 30 Nondiscrimination Exception---Employment---For Seventh-day Adventists the free exercise of religion includes the right to operate educational institutions that are distinctively Seventh-day Adventist. The creation and maintenance of such institutions require that they be staffed only by those individuals who are in complete harmony with the beliefs and practices of the Church. Hence, in the employment of personnel for its educational institutions one of the occupational qualifications for any position is that the individual must be a Seventh-day Adventist, committed to the program of the Church.

School boards shall, officially and in practice, abide by the following policies relating to employment:

1. Equal employment opportunities shall be afforded to all on the basis of qualifications, without regard to race, color, gender, national origin, ancestry, physical handicap, age, height, weight, marital status (single, married, or widowed), or prior military service.

2. Inasmuch as the personal life and the professional identity of an individual are inseparable, all employees are expected to conform to the standards of conduct that are in harmony with Seventh-day Adventist principles.

SEVENTH-DAY ADVENTIST CURRICULUM
CATALOG

HANDWRITING
BASIC

A REASON FOR WRITING

This penmanship program, developed by Eva Hoshino and Carol Ann Retzer, uses a thematic cycle of Scriptural texts for handwriting instruction. The program includes thirty-six weekly lessons with directed daily practice activities culminating with the verse of the week. Ideas are also presented for using the completed verses in on-going witnessing activities. It is recommended that the decorated verses be used with the family three times a month and be shared outside the family at least once a month.

The research-based curriculum systematically develops letter formation, size and proportion, spacing, slant, alignment, and line quality. The program track sequence—manuscript, transition, cursive—it to be carefully followed. Cursive pages are to be removed from second grade worktexts. An alternation plan of instruction may occur within the cursive track if needed. An instructional video, teacher's guidebooks, student alphabet desk cards, alphabet wall sheets, and extra border sheet packs are also available.

Grade K	God Made My World - introduction to manuscript
Grade 1	Words of Promise - manuscript
Grade 2	Words of Jesus – manuscript
Grade 3	Words to Live by - transition
Grade 4	Words of Love - cursive
Grade 5	Words of Praise - cursive
Grade 6	Words of Wisdom - cursive

SEVENTH-DAY ADVENTIST CURRICULUM CATALOG

ABOUT THE LIFE SERIES

The Seventh-day Adventist elementary reading curriculum is designed to provide instruction for students that will enable them to develop optimum reading skills and competencies and that will create in the student an interest in reading as a source of learning. In addition, the reading curriculum is designed to reinforce the principles of the Seventh-day Adventists faith and to create in the student a taste for that literature that builds character and encourages a sense of mission and service.

In selecting and developing materials for the LIFE SERIES, editors were guided by criteria established by the Reading Steering Committee, which included the following goals and purposes:

1. Provide the learner with optimum reading skills.
2. Foster in the learner an interest in reading as a source of learning, relaxation, and worship.
3. Reinforce in the learner the principles and standards of the Seventh-day Adventist Church.
4. Develop discerning and discriminating readers who are able to identify quality literature that is in harmony with Christian principles.

Content selections were based on criteria established by the Reading Steering Committee with goals as outlined below.

Content selection will:

1. Be in harmony with and promote Biblical doctrine and Seventh-day Adventist goals of service, spiritual values, and attitudes

2. Be appropriate to the experience and background of the children for whom it is intended

3. Include knowledge and information that will fit children for usefulness in a real world and for practical duties in life (MYP 279)

4. Include material that will stimulate thinking and have a healthful, strengthening, and sanctifying effect on the mind (MYP 287)

5. Include material that will encourage a taste for quality literature and promote discrimination in the selection of leisure reading matter

6. Include realistic characters

7. Include proper reading matter that will be enjoyable and will afford amusement and recreation without demoralizing the mind (AH 411)

8. Include colorful, realistic illustrations that are appropriate for children and accurately depict events described in the content material

9. Avoid intermingling concepts of good and evil, thus confusing the mind (CT 458-9)

10. Avoid addictive, sentimental, sensational, or escapist material that will unfit the mind for serious study (CT 139)

11. Avoid use of expressions that would tend to date the material or could have meanings other than those that are intended

In addition to endeavoring to meet these criteria, the editors have attempted to provide a reading program that will meet the needs of children in the various settings found in Seventh-day Adventist education. For example, much emphasis has been placed on the development of self-instructing materials that should be of assistance to the multigrade teacher whose instructional time with any given grade may be limited.

SEVENTH-DAY ADVENTIST CURRICULUM CATALOG

SCIENCE-HEALTH
BASIC

Grade 5	Discover God's World, Series A
Grade 6	Discover God's Creation, Series B
Grade 7	Explore God's World, Series A
Grade 8	Explore God's Creation, Series B

Bob Jones University Press Website: excerpts from "The Christian Philosophy of Education."
Www.bjup.com/resources/articles/white_papers/philosophy_of_ed.html

Purpose

The purpose of Christian education is the directing of the process of human development toward God's objective for man: godliness of character and action. It bends its efforts to the end "that the man of God may be perfect, throughly furnished unto all good works" (II Tim. 3:17).

This goal of godliness presupposes the experience of regeneration. As education in general begins with physical birth, Christian education proper begins with spiritual rebirth, when the life of God is communicated to the soul. To say that Christian education proper begins with the new birth is not, however, to say that it is pointless before regeneration. The student can be provided with necessary awarenesses of God and responses to His Word so that when the Holy Spirit brings conviction of sin he will readily and with full understanding accept Christ as his Saviour. Timothy from childhood knew "the holy Scriptures, which are able to make thee wise unto salvation through faith which is in Christ Jesus" (II Tim. 3:15). To make children and even unregenerated adults "wise unto salvation" is no less a legitimate function of Christian education today.

Growth in godliness proceeds step by step from regeneration toward full maturity "in the knowledge of our Lord Jesus Christ" (II Pet. 1:5-8). This growth, like regeneration, is made possible by divine grace (Titus 2:11-13). It results from the emulation of Christ, who, as "the express image" of "the Majesty on high" (Heb. 1:3), is the visible manifestation of the divine nature that God has ordained for man's imitation. As regenerated man continues to occupy his mind with the

truth of God revealed in Christ, he is "changed into the same image from glory to glory, even as by the Spirit of the Lord" (II Cor. 3:18). His full conformity to the image of God in Christ--his Christ-likeness--is the goal of Christian education (Rom. 8:29). This goal is pursued with the recognition that its complete realization awaits the full view of Christ in the life to come, when "we shall be like him; for we shall see him as he is" (I John 3:2).

Responsibility

In the Scriptures God has commanded two institutions to educate: the home and the church. As an extension of either or both of these institutions, the Christian school has a Biblical mandate to educate.

The home

The Bible makes clear that education is to begin in the home (Gen. 18:19; Deut. 6:7; Prov. 22:6; Eph. 6:4; II Tim. 1:5; 3:15). It makes parents responsible for their children and charges them with an educational task.

The church

The New Testament indicates that the responsibilities of the church include edification as well as evangelism (Matt. 28:19-20; Acts 2:42; II Tim. 2:2). The Scriptural representation of the church as a body--an organism that grows and matures--implies a teaching function for this institution. Also, the recognition of the gift of teaching by the New Testament (Rom. 12:4-7; I Cor. 12:28) assumes the necessity of teaching in the local churches.

The Christian school

Christians have a Biblical mandate to educate in their homes and in their churches. In order to reinforce the educational ministries of these institutions or to protect their ministries from secular interference, Christian parents or church members, acting either individually or in concert, may elect to form a Christian school. In doing so, they are acting from religious conviction. To deny them their choice of means in carrying out the Biblical mandate of Christian education is to deny them the exercise of their religious convictions.

It follows that the education of children is the prerogative not of the state but of the parents or church members. Furthermore, it is evident that allowing the state to dictate the standards and procedures of Christian education jeopardizes the ability of parents and of church members to carry out their responsibility to God for the education of their children. The subjection of the Christian school to the control of the state or of any other secular agency is, in effect, the subjection of the Christian homes and churches to secular domination. It is rightly regarded as vicious, for secular control (even that which may appear benign) is incompatible with the aims of a spiritual ministry.

The work of the Christian school is an extension of the Christian educational ministries of the Christian home and the church. Its purpose, therefore, is the development of the student in the image of God. This purpose determines both the content and the means of instruction.

Content

King David exhorted his son, "And thou, Solomon my son, know thou the God of thy father, and serve him with a perfect heart and with a willing mind" (I Chron. 28:9). How perfectly David must have understood that the education of the child of God must include both the knowledge of God and the preparation for exercising that knowledge in service. Accordingly, in Christian education students are taught to *know* God and to *imitate* Him in His character and in His works.

The knowledge of God

The whole body of Christian educational theory rests upon the recognition that all truth is of God. He is the God of truth (Ps. 31:5); His Son is the Lord of truth (John 14:6); His Spirit is the Spirit of truth (John 14:16-17). All truth, whether discerned or undiscerned by man, comes forth from a single source and, therefore, is one harmonious whole. Consequently, God's written self-revelation is the starting point of all rational inquiry and the guide to all interpretation of reality. No concept can be true that conflicts with the statements of the [chScriptures.[ch Conversely, no untruth is a legitimate support of divine revelation or has any place in the ministry of spiritual truth. A reverence for the God of truth compels a conscientious regard for accuracy in all areas of factual investigation and reporting.

Since it is the purpose of Christian education to develop redeemed man in the image of God, Christian educators must point students to the original of this image, God Himself. Students come to know God by studying His revelation of Himself in His Word and in His works. Of these, the more fully revealing of God is His Word; and, therefore, the Bible is the center of the Christian school curriculum. The Bible is not only the most important subject matter but also the source

of the principles determining the other subject matters and the way in which they are taught. The presentation of Biblical truth is thus not confined to a single segment of the curriculum--the study of the Bible--but diffused throughout the teaching of all subjects. The teacher's knowledge of the Scriptures controls his selection and interpretation of materials and determines his whole perspective on his subject matter. The Scriptures possess this privileged status in the curriculum, for they are the primary means of conveying the knowledge of God.

This knowledge of God implies more than just knowledge *about* God. Certainly an acquaintance with the facts about God in the written revelation is important. But the knowledge of God that is unique to Christian education is a *personal* knowledge that begins with repentance of sin and faith in Jesus Christ as Saviour and develops through obedience to and communion with God. To know God is to be born into the family of God and to live in fellowship with Him (I John 5:20; Phil. 3:10). It follows that without a student body composed mainly of students possessing this personal knowledge of God, no school can legitimately be regarded as a Christian educational institution.

Though the Word of God is the main source of the knowledge of God, both factual and personal, and therefore deserves precedence, the works of God are also an important part of the Christian school curriculum. The creation reveals the Creator, and that which reveals God is a proper study for man. Indeed, the Scriptures themselves invite man to consider God's earthly handiwork and hold him responsible for recognizing in it the work of God (Job 38-39; Rom. 1:18-20).

Especially is God revealed in His rational creation, man, who having been created in the image of God is the highest of God's works on earth. It is for this reason that the Christian school gives emphasis to the "humanities": the study of man's

language, his literature, his artistic achievements, the record of his history, the logic of his mathematical reasoning, and other forms of his personal and cultural expression. But the natural sciences are not disregarded. The glories of the vast universe and the myriad wonders of man's earthly habitation testify that their Creator is a God of order, of beauty, and of power (Ps. 19:1; Rom. 1:20). The perfect suitability of man's physical environment to his needs and the fact that God committed the earth to man to subdue and enjoy (Gen. 1-2) witness to the goodness of God in His love for and delight in His human creation. Though the study of nature has often displaced the study of nature's God, even to the point of man's worshiping the creation rather than the Creator (Rom. 1:25), nevertheless God Himself pronounced the material universe "good" and established its laws and processes as means of accomplishing His will for man (Gen. 1:31). The Christian school curriculum includes astronomy, physics, chemistry, biology, mathematics, and related subjects because they provide a knowledge of God's nature and His work in this world. In the curriculum of the Christian school, the voice of creation joins with that of the written revelation in praise of the glory and goodness of God.

The instruments

The means of achieving godliness--the purpose of Christian education--is the imitation of God. The imitation of God by the student depends upon and conforms to the imitation of God by the teacher. The teacher in the Christian school stands in much the same relation to his students that Paul stood in with regard to his Corinthian converts when he wrote, "Be ye followers of me" (I Cor. 4:16). The Spirit-filled Christian teacher stands in the place of God, representing God to the student. What the student knows of God is often what he sees in his teacher. "Ye became followers of us, and of the Lord," Paul reminded the Thessalonians (I Thess. 1:6). It is for this

reason that the Christian school must pay careful attention to the character and conduct of its teachers. No school that is careless concerning the Christ-likeness of its teachers can hope to fulfill the purpose of Christian education.

Of course, a Christian school should be concerned about the professional as well as the spiritual preparation of its teachers. Knowledge of the student and mastery of the subject to be taught as well as of the methodology of its presentation are necessary for effective teaching. Jesus Christ knew His students (John 2:25) and His subject matter and was competent in every conceivable legitimate technique of imaginative, resourceful teaching. He, therefore, taught with a commanding assurance and vigor that amazed the multitudes (Matt. 7:29). No amount of carefully prepared educational materials, however important they may be as tools, can compensate for the lack of a carefully prepared teacher: one who has followed the spiritual and professional example of his Master.

The position of the teacher is one of authority and service, and the two are intertwined. In Scriptural leadership, he who leads must also serve (Matt. 20:25-28). In fact, he rules in order to serve. Christ, our Lord and Master, not only served mankind supremely in His death but also continues to serve His people. He can serve most fully those who accept His rule. Similarly the Christian teacher exercises authority over the student in order to serve the student in his quest for Christ-likeness. The teacher's ability to serve the student depends to a great extent upon the student's acceptance of his rule.

Likewise the Christian school administrator exercises authority over both the teacher and the student in order to serve the teacher in his service of the student. The chief responsibility of the administrator is to provide the most favorable environment possible for the communication of

Christ to the student. The teacher can function as a "teacher come from God" only as the administration serves his needs and, through him, the needs of the student. Conversely the administration can serve the teacher and the student in the process of Christian education only as they submit to its rule. As a godly administration undergirds the ministry of a godly teacher to a responsive student, the goal of godliness in the student's character and action is increasingly realized.

A Beka Book Web Site, Curriculum Distinctives. www.abeka.com/distinctives.html.

BIBLE

The clear teaching of the Bible is the foundation for all other learning.

Since the Bible is the most important subject of Christian education, we believe it should be taught specifically and systematically to all each day. The *A Beka Book* Bible Program presents the Bible in the narrative style in which it is written. The stories of the Old and New Testaments in the lower grades lead up to a presentation of the more abstract statements in the New Testament epistles and the wisdom books for older students. The lessons flow from the Word of God, through the heart of the teacher, to the heart of the student. The curriculum has been planned so that students going through the *A Beka Book* Bible Program will be thoroughly acquainted with the basic portions of the Scriptures.

HISTORY

Students need a realistic view of history, government, geography, and economics based upon the foundational truths of the Scriptures.

Ever since H. G. Wells published his *Outline of History* in 1920, the theme of world history texts has been man's supposed progress from savagery toward socialism, from tribal religious toward one-world government. American history is usually presented as a series of conflicts-rich vs. poor, black vs. white, North vs. South, labor vs. management, male vs. female, etc.

Our *A Beka Book* texts reject the Marxist/Hegelian conflict theory of history in favor of a truthful portrayal of peoples, lands, religions, ideals, heroes, triumphs, and setbacks. The

result has been positive, uplifting history texts that give students an historical perspective and instill within them an intelligent pride for their own country and a desire to help it back to its traditional values.

We present government as ordained by God for the maintenance of law and order, not as a cure-all for the problems of humanity. We present free-enterprise economics without apology and point out the dangers of Communism, socialism, and liberalism to the well-being of people across the globe. In short, *A Beka Book* offers you a Christian and conservative approach to the study of what man has done with the time God has given

MATHEMATICS

No subject matter better reflects the glory of God than mathematics. To study mathematics is to study God's thoughts after Him, for He is the great Engineer and Architect of the universe.

Unlike the "modern math" theorists, who believe that mathematics is a creation of man and thus arbitrary and relative, we believe that the laws of mathematics are a creation of God and thus absolute. All of the laws of mathematics are God's laws. Our knowledge of God's absolute mathematical laws may be incomplete or at times in error, but that merely shows human frailty, not relativity in mathematics. Man's task is to search out and make use of the laws of the universe, both scientific and mathematical.

A Beka Book provides attractive, legible, workable traditional mathematics texts that are not burdened with modern theories such as set theory. These books have been field-tested, revised, and used successfully for many years in Christian schools. They are classics with up-to-date appeal. Besides training students in the basic skills that they will need all their lives, the *A Beka Book* traditional mathematics books teach

students to believe in the absolutes of the universe, to work diligently to get right answers, and to see the facts of mathematics as part of the truth and order that God has built into the real universe.

SCIENCE/HEALTH

Science is the study of God's order, provision, and reasonableness as revealed in His physical creation.

While secular science textbooks present modern science as the opposite of faith, the *A Beka Book* science texts teach that modern science is the product of Western man's return to the Scriptures after the Protestant Reformation, leading to his desire to understand and subdue the earth, which he saw as the orderly, law-abiding creation of the God of the Bible.

The *A Beka Book* Science and Health Program presents the universe as the direct creation of God and refutes the man-made idea of evolution. Further, the books present God as the Great Designer and Lawgiver, without Whom the evident design and laws of nature would be inexplicable. They give a solid foundation in all areas of science -- a foundation firmly anchored to Scriptural truth. Teachability is assured through accurate, interesting writing, carefully planned demonstrations that can be performed with a minimum of equipment, chapter terms and questions, full-color illustrations, consideration of the interests and comprehension skills of students at each grade level.

ENGLISH

Because God has given us the great commission of communicating His truth to mankind, we must give our students the finest tools available to carry out this goal in a reasonable, well-articulated manner.

God gave us our powers of thought and language and chose to

reveal His will and His ways to us in a written form, the Bible; thus we need to pay particular attention to the teaching of grammar, spelling, vocabulary, composition, and literature as we seek to educate students from a Christian perspective.

Since Darwin, linguists have sought in vain for a credible explanation for the origin of language. Having accepted evolutionary philosophy, they can only think that language must be simply a response to a stimulus, an emotional outcry, an imitation of animals.

If such foolishness were true, then any talk of language being governed by rules or any claims that some expressions are better than others would be inappropriate, and relativism would rule. This explains many English programs today. But as Christians, we still believe that the Bible provides the only credible explanation for the universe, of man, and of language. Therefore, it is easy to see in language a structure which reflects the logic, reasonableness, and orderliness of the One who created man and his language.

National Christian School Association, web page: Statement of Purpose

www.nationalchristian.org/purpose/index.html

In Joshua chapter four as the children of Israel are about to cross into the promised land, they face the one last obstacle- the Jordan River. After God allows the people to walk across miraculously on dry ground, God commands the nation to build an altar. Twelve stones were taken from the bottom of the Jordan River for the altar. In verse six, the reason for the memorial is given when God says "In the future when your children ask you 'What do these stones mean?' tell them that the flow of the Jordan was cut off before the Ark of the Covenant of the Lord."

Notice that the natural curiosity of a child is assumed. God does not say "If your children ask," he says "When your children ask." The function of a Christian school is like that of the altar beside the Jordan River. Institutions of Christian education exist to be ready with a Biblical answer when our children ask about the world around them.

Christian education is much more than just a Bible class added to the state's curriculum or daily devotional services added to an otherwise secular environment. Christian education is about the intersection of faith with every part of the curriculum and each activity that the school sponsors. Christian schools are uniquely able to handle the questions about the nature of God, his creation and what he expects of us-questions that can arise naturally out of any class.

An increasing number of parents are seeking the difference found in Christian education. Enrollment in NCSA schools has increased 27 percent in the past decade. In addition, several new schools are beginning each year.

Southern Baptist Association of Christian Schools website; www.sbacs.org

SBACS Vision To advance a system of Christian schools of excellence, uniting home, church and school in Jesus Christ through Kingdom Education* so that the generations to come will know the Truth of God's Word and not forget His works, nor be taken captive by the vain philosophies of their day. Psalm 78:1-7; Colossians 2:8

The cause of education in the kingdom of Christ is co-ordinate with the causes of missions and general benevolence and should receive along with these the liberal support of the churches. An adequate system of Christian schools is necessary in a complete spiritual program for Christ's people (Baptist Faith and Message...1963

*Kingdom Education defined: A life-long, Bible-based, Christ-centered process of leading a child to Christ, building a child up in Christ, and equipping a child to serve Christ. Glen Schultz, Kingdom Education, LifeWay, 1998

SBACS Mission The Southern Baptist Association of Christian Schools will impact the education of school-aged children toward a biblical worldview by providing information, training, fellowship and avenues for influence for pastors and educational leaders of Southern Baptist schools and churches. Revised February 8, 1998 SBACS Executive Committee, Orlando, Florida

Southern Baptist Convention The Southern Baptist Convention, which meets annually, records three statements related to Christian schools in their minutes. The first reference is in article XX of the 1925 Baptist Faith and Message. The second reference is in article XII of the 1963 Baptist Faith and Message. The third reference is the adoption

of a Christian school resolution at the convention in Atlanta in 1999.

The 1963 Baptist Faith and Message statement on education identifies the need for an adequate system of Christian school to provide a complete spiritual program for Christ's people. The authors, paragraph 2, list three levels of the school system: Christian schools, college and seminary. Interestingly, both statements identify the need to provide a complete spiritual program for "Christ's people" not just Southern Baptists.

1963 Baptist Faith and Message, XII. EDUCATION The cause of education in the kingdom of Christ is co-ordinate with the causes of missions and general benevolence and should receive along with these the liberal support of the churches. An adequate system of Christian schools is necessary in a complete spiritual program for Christ's people.

In Christian education there should be a proper balance between academic freedom and academic responsibility. Freedom in any orderly relationship of human life is always limited and never absolute. The freedom of a teacher in a Christian school, college, or seminary is limited by the pre-eminenance of Jesus Christ, by the distinct purpose for which the school exists.

Deuteronomy 4:1, 5,9,14; 6:1-10; 31:12-13; Nehemiah 5:2; 7:24ff; 18:19-20; Luke 2:40; 1 Corinthians 1:18-31; Ephesians. 4:11-16; Philippians 4:8; Colossians 2:3,8-9; 1 Timothy 1:3-7; 2 Timothy 2:15; 3:14-17; Hebrews 5:12-6:3; James 1:5; 3:17.

1925 Baptist Faith and Message, XX. EDUCATION Christianity is the religion of enlightenment and intelligence. In Jesus Christ are hidden all the treasures of wisdom and knowledge. All sound learning is therefore a part of our Christian heritage. The new birth opens all human faculties

and creates a thirst for knowledge. An adequate system of schools is necessary to a complete spiritual program for Christ's people. The cause of education the Kingdom of Christ is coordinate with the causes of missions and general benevolence, and should receive along with these the liberal support of the churches.

Deuteronomy 4:1,5, 9,13–14; Deuteronomy 6:1,7:1–10; Psalm 19:7–8; Proverbs. 8:1–7; Proverbs 4:1–10; Matt. 28:20; Colossians 2:3; Nehemiah 8:1–4

The Lutheran Church--Missouri Synod
Schools: www.lcms.org

Since 1640 Lutheran schools have existed in our country. Early Lutheran settlers upheld the high value of education which continues to be upheld by The Lutheran Church -- Missouri Synod (LCMS). According to the LCMS by-laws, "the most effective education agencies available to the church for equipping children and youth for ministry are the full-time Lutheran elementary and secondary schools. "Initially our schools were begun to teach the church family's students how to read so they could study the Bible and the catechism. Gradually, the curriculum was expanded to include the other subjects which became standard in the "new" public schools, so Lutheran school students could become productive Christian citizens and church leaders. It is assumed that the Christian faith is shared, as opportunities arise, throughout the school day in all subjects by Lutheran Christian teachers. From our oldest Lutheran school, St. Mathew in Manhattan, which has been continuously operating since 1752, the LCMS has expanded to 2023 Lutheran schools. There are Lutheran schools in every state. Currently, there are 62 LCMS high schools, 991 elementary schools and 1,170 early childhood centers serving a total of 280, 714 students. Of this total, 199,209 students are in elementary schools, 16,047 in secondary schools and 65,458 in early childhood centers. A total of 17,819 educators serve in these schools, 70% of which are specifically prepared and certified by the LCMS to serve in our Lutheran schools. Most early childhood educators are employed part time. These church-certified educators are considered to be Ministers of Religion, Commissioned by the LCMS. Most also hold state teaching certificates. Approximately 42% of the students in Lutheran schools are members of the operating congregations. The rest, 58%, come from the general public, seeking the quality Christian education we provide.

Lutheran Church Missouri Synod
Concordia Publishing House
School – Linking Faith to Life
www.cph.org/school/schoolindex.html

Christian schools make a difference in the lives of students and their families. As The Christian Education Specialist, CPH has a deliberate, distinctive goal: to provide you with quality resources that equip you for successful teaching and active ministry.

Our development and editorial staff includes experienced educators; people who understand your needs because they've worked in the classroom too.

Because we share your vision, you can be assured that all our materials are Bible-based and Christ-centered, so that your efforts to include Christ in all aspects of education are successful.

Listed for sale by Concordia:

Integrating the Faith
A Teachers Guide for Curriculum
The Indispensible Gujide for Effective Christian Education

Incorporates Christian principles into all curriculum

Six complete volumes

The ad copy states:

"Support the Word of God and Presence of Christ in Every Educational Setting"

Christian Schools International Publications Catalog
www.gospelcom.net/csi/catalog

Christian Schools International publishes textbooks and teacher guides for a variety of subject areas, including Bible, scoience, health, literature, writing, spelling, physical education, and more. CSI also distributes videso, CD-ROMS, and other resources to reinforce teaching and learning.

The materials that CSI publishes for students and teachers incorporate a clear biblical perspective on the subject area. In addition, the materials are attractive, up-to-date, and academically sound, promoting effective teaching and learning.

Declaration On Christian Education
Gravissimum Educationis
Proclaimed By
Pope Paul VI
On October 28, 1965

Christian Education

Since all Christians have become by rebirth of water and the Holy Spirit a new creature(8) so that they should be called and should be children of God, they have a right to a Christian education. A Christian education does not merely strive for the maturing of a human person as just now described, but has as its principal purpose this goal: that the baptized, while they are gradually introduced the knowledge of the mystery of salvation, become ever more aware of the gift of Faith they have received, and that they learn in addition how to worship God the Father in spirit and truth (cf. John 4:23) especially in liturgical action, and be conformed in their personal lives according to the new man created in justice and holiness of truth (Eph. 4:22-24); also that they develop into perfect manhood, to the mature measure of the fullness of Christ (cf. Eph. 4:13) and strive for the growth of the Mystical Body; moreover, that aware of their calling, they learn not only how to bear witness to the hope that is in them (cf. Peter 3:15) but also how to help in the Christian formation of the world that takes place when natural powers viewed in the full consideration of man redeemed by Christ contribute to the good of the whole society.(9) Wherefore this sacred synod recalls to pastors of souls their most serious obligation to see to it that all the faithful, but especially the youth who are the hope of the Church, enjoy this Christian education.(10)